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September 21, 2023

VIA ECF

Honorable Michael A. Shipp
United States District Judge
Clarkson S. Fisher Bldg. & U.S. Courthouse
402 East State Street
Trenton, New Jersey 08608

Re: *United States v. Khaimov, et al.*, Crim. No. 18-462

Dear Judge Shipp:

As Your Honor may recall, this Firm represents defendant Sam Khaimov in the above-referenced matter. We write to respectfully request an extension of time – until Friday, October 6, 2023 – to respond to Express Scripts, Inc. (“ESI”)’s Motion to Quash the Rule 17 subpoena issued in this matter.

On March 31, 2023, this Court granted an *ex parte* application for the issuance of a *subpoena duces tecum* on third-party ESI. [ECF No. 111]. On June 5, 2023, counsel for ESI filed an *ex parte* Motion to Quash the third-party subpoena. [ECF No. 120 *Sealed*]. Defense counsel did not receive a copy of that motion until September 13, 2023 when the Court set the deadline for Defendant’s opposition to that motion for this Saturday, September 23, 2023. [ECF No. 121]. Upon receipt of ESI’s Motion to Quash, we have been investigating ESI’s claim that items responsive to the third-party subpoena are already available to Defendants with an eye toward responding to the motion to quash. For this reason, we respectfully request until October 6, 2023 for that response. If this extension is satisfactory to the Court, as we hope it will be, the Court may, if Your Honor wishes, So Order it in the space provided below. Of course, if the Court has any questions or concerns with regard to this matter, please do not hesitate to contact me or any of my colleagues.

As always, we thank Your Honor for your kind consideration of this matter.

Respectfully yours,

A handwritten signature in black ink, appearing to be 'C. Adams'.

CHRISTOPHER D. ADAMS, ESQ.

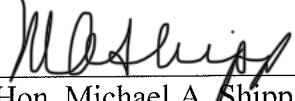


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cc: Counsel of Record (via ECF)
Sarah Hellman, Esq. (via email)

So Ordered this 25th day of September, 2023

**Defendant's Opposition to the Motion to
Quash must be filed by October 6, 2023.**

So Ordered: 
Hon. Michael A. Shipp, U.S.D.J.